

Federal Defenders  
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Southern District  
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MEMO ENDORSED

David E. Patton  
Executive Director  
and Attorney-in-Chief

Susanne Brody  
Attorney-in-Charge  
White Plains

July 23, 2020

The Honorable Kenneth M. Karas  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

Re: United States v. Jimenez, et al, 10 Cr 856 (KMK)

Dear Honorable Karas:

I hope you are well. I represent Martin Dejesus Reyes-Maria in the above referenced case. I am writing to respectfully request an approximately three-week adjournment of the motions schedule and status conference in the above referenced case.<sup>1</sup> I have spoken to A.U.S.A. James Ligtenberg, and he does not object to this request. Additionally, I have communicated with Mr. Brian Kaplan, attorney for Mr. Mayobanex Reyes, and he joins in this request. I have not yet heard back from Mr. Barry Ross Goldberg, attorney for Mr. Jimenez. My client, Martin Dejesus Reyes Maria, and the co-defendants (Jonathan Jimenez and Maubyobanex Reyes) are not incarcerated in this matter.

I am seeking this adjournment because I have been in communication with A.U.S.A. James Ligtenberg and I am optimistic that Mr. Reyes-Maria's case can be resolved in the next few weeks. Because of this, I ask that Your Honor grant this three-week extension so that I can attempt to resolve this matter without the need for motion practice or a trial. I have no objection to time being excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A).

Thank you very much for your consideration.

Granted. Time is excluded until 8/14/20 to allow counsel time to explore a resolution of this case. The interests of justice from this exclusion outweigh Defendant's and the public's interest in a speedy trial. See 18 U.S.C. Section 3161(h)(7)(A).

So Ordered.  7/24/20

Sincerely,



Benjamin Gold

cc: AUSA James Ligtenberg (via e-mail and ECF)  
Barry Ross Goldberg (attorney for Jonathan Jimenez) (via e-mail and ECF)  
Brian Ira Kaplan (attorney for Mayobanex Reyes) (via e-mail and ECF)

<sup>1</sup> Currently, motions are due on July 24, 2020.